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**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re: : **CHAPTER 13**

Dominic Forte : **CASE NO. 17-28799-JNP**

DEBTOR : **NOTICE OF MOTION**
: **TO VACATE STAY AND FOR**
: **PROSPECTIVE RELIEF**

: **HEARING DATE: March 20, 2018**

TO: Brad J. Sadek, Esq., Isabel C. Balboa, Trustee, Dominic Forte, Debtor, Donna Lynn Forte, Co-Mortgagor.

PLEASE TAKE NOTICE that the undersigned, attorney for the Mortgagee, Deutsche Bank National Trust Company as Trustee for the Soundview Home Loan Trust 2007-NS1 Asset-Backed Certificates, Series 2007-NS1, will apply to the above-named Court at the U.S. Bankruptcy Court House, 401 Market Street, Camden, New Jersey, in Courtroom #4C, on March 20, 2018, at 10:00 a.m., or as soon thereafter as counsel may be heard, for an Order to Vacate the Automatic Stay and for Prospective Relief pursuant to 11 U.S.C. § 362.

This Motion is being submitted under Local Rule 4001-1. An accompanying brief has not been submitted because Local Rule permits a Secured Creditor to file the instant Motion supported by a Certification attesting to the operative circumstances and the Movant's entitlement to the relief requested. Pursuant to Federal Rule of Bankruptcy Procedure 4001 (9) (3), Movant requests that any modification of Relief from the Automatic Stay be immediately effective.

PLEASE TAKE FURTHER NOTICE that if you contest this Motion, you must appear in Court on the date noted above and you are further required to file with the Court and serve on the undersigned a written response, in accordance with Rules of Court, no later than seven (7) days prior to the hearing date pursuant to Local Bankruptcy Rule 9013-2(a)(2). If a written response is not served and filed, the Court will treat this Motion as uncontested and may not conduct a hearing.

PLUESE, BECKER & SALTZMAN, LLC

BY: /s/ Rob Saltzman
Rob Saltzman, Esquire

DATED: February 23, 2018